

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

KINDHEARTS FOR CHARITABLE HUMANITARIAN
DEVELOPMENT, INC.,

Plaintiff,

v.

TIMOTHY F. GEITHNER, in his official capacity as the
Secretary of the Treasury;
ADAM J. SZUBIN, in his official capacity as the Director
of the Office of Foreign Assets Control; and
ERIC H. HOLDER, in his official capacity as the Attorney
General of the United States,

Defendants.

Civil No. 3:08-cv-2400
Chief Judge James G. Carr

STATUS REPORT

Plaintiff respectfully submits this status report pursuant to the Court's order of July 29, 2013, to apprise the Court of the progress that has been made in consummating the settlement agreement in this case.

Since the last status report, counsel have successfully contacted all of the remaining banks holding Plaintiff's funds. With two exceptions, all of those banks have disbursed Plaintiff's funds to the charities and in the proportions set out in the settlement agreement. The two exceptions are Huntington National Bank and DFS Services, LLC. Counsel expect that Huntington will complete the distribution of the funds in its possession by the end of this month. Counsel have been in contact with a representative of DFS, who last stated on July 29 that he would send a confirmation when the funds had been transferred via wire in accordance with the settlement agreement. Counsel have not received any confirmation or any response to a number of emails sent to that representative since July 29.

The undersigned have also continued to work with the government and with Plaintiff's representatives to dispose of all remaining physical assets of Plaintiff still in the government's possession. Once that task is completed and once counsel receive confirmation of DFS's and Huntington's transfers, Plaintiff will take the necessary steps in accordance with the agreement to dissolve itself. At that point, the government will delist Plaintiff and pay Plaintiff's attorney's fees. The parties will then jointly move to lift the preliminary injunction still in place and to dismiss this lawsuit with prejudice.

The parties anticipate needing approximately four months to conclude these final steps and respectfully ask the Court to require the parties to move to dismiss this suit or submit a further status report by December 20, 2013.

Respectfully submitted,

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